

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

JUL 18 2014

for the

District of Maryland

AT BALTIMORE  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

BY

DEPUTY

United States of America

v.

Troy Anthony EADY

Case No.

14-1625TJS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 2012 - April 2014 in the county of Baltimore County in the  
District of Maryland, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. Section 1344;  
18 U.S.C. Section 1028A

Bank Fraud;  
Conspiracy to Commit Bank Fraud

This criminal complaint is based on these facts:

See Affidavit attached hereto and incorporated by reference.

☒ Continued on the attached sheet.



Complainant's signature

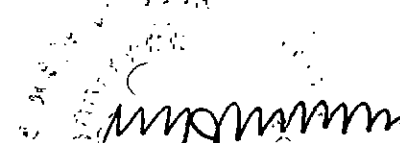
Theodore R. Lohman, U.S.S.S., Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/18/2014

City and state: Baltimore, Maryland



Judge's signature

Timothy J. Sullivan, United States Magistrate Judge

Printed name and title

**14-1625TJS**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT**

I, Theodore R. Lohman, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint and application for an arrest warrant.
2. I am a Special Agent with the United States Secret Service, and have been since May 2011. I am a graduate of the Federal Law Enforcement Training Center Basic Criminal Investigator Training Program and the United States Secret Service Special Agent Training Course. I am currently assigned to the Criminal Squad of the Baltimore Field Office and have participated in numerous financial crime investigations to include counterfeit, identity theft, check fraud, and bank fraud cases. I have conducted physical surveillances, executed search warrants, reviewed computer and bank records, and secured other relevant information using other investigative techniques. I have completed the Basic Investigation of Computers and Electronic Crimes Program (BICEP), understanding the fundamentals of computer hardware, operating systems, computer networks, hacking and malware, information security, and the processing of electronic evidence. I have also completed extensive counterfeit detection training through the United States Secret Service Special Agent Training Course.
3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint and arrest warrant and does not set forth all of my knowledge about this matter.



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4. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. §§ 1344 (Bank Fraud) & 1349 (Conspiracy to Commit Bank Fraud), and other federal criminal statutes, have been committed, are being committed, and will be committed by TROY ANTHONY EADY and others.

**PROBABLE CAUSE**

5. M&T Bank fraud investigators reported to law enforcement – including the United States Secret Service and the Baltimore County Police Department (BCPD) – that they had identified a suspect conducting a series of related fraud transactions. Bank investigators had received reports of fraud conducted at various ATMs and banking branches around Baltimore, Maryland. By collecting surveillance photographs from ATMs and records of fraud transactions, bank investigators identified an individual making fraudulent withdrawals from various bank accounts dating back to February 2012. The surveillance footage depicted a black male, approximately 25-30 years old, depositing fraudulent checks and withdrawing funds by using debit cards and Personal Identification Number (PIN). That individual was identified as TROY ANTHONY EADY.

6. The scheme involved depositing fraudulent checks into the accounts of M&T Bank customers. Those fraudulent checks were genuinely issued by a bank, but connected to accounts that were closed or no longer valid. EADY forged signature and amount information on the checks and deposited them. M&T Bank typically makes check deposits available to customers immediately – before the check is validated with the issuing institution. After the deposit of the fraudulent check, EADY would quickly seek to withdraw money from the account before the M&T Bank became aware that the check was written against an account that was no longer valid. EADY would withdraw money by using the debit card and PIN of the true account

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holder at ATMs or other locations that where EADY could purchase money orders with the debit cards he obtained.

7. BCPD interviewed several account holders whose accounts, debit cards, and PINs were used. Those individuals stated that they had provided their account information, debit cards, and PINs to EADY in return for a cash payment from EADY.

8. Investigators have attributed over 50 fraud transactions to EADY through the use of video and photo surveillance cameras at ATM and other records. This includes:

a. On or about July 25, 2012, EADY deposited into the Suntrust Bank account of T.W., two M&T bank checks, #115 and #104, from the account of D.S., and payable to T.W. in the amounts of \$1,400 and \$1,520, respectively. This check was fraudulently written by EADY. On or about July 26, 2012, EADY withdrew or attempted to withdraw money from T.W.'s M&T Bank account via ATM and also used T.W.'s debit card and PIN to purchase a MoneyGram money order from a Walmart in the amount of \$1,000.60.

b. On or about November 26, 2013, EADY deposited into the M&T Bank account of M.C., a Municipal Employee's Credit Union (MECU) check, # 155, from the account of J.C. in the amount of \$1,505. Continuing on or around this same date, EADY also deposited into the M&T Bank account of M.C., a Citibank check, #200, from the account of D.F. in the amount of \$1,762. These checks were fraudulently written by EADY. Continuing on or about this same date, EADY withdraws \$240 from the M&T ATM account of M.C. On or about November 27, 2013, EADY uses the debit card of M.C., to purchase MoneyGram money orders from a Walmart in the amount of \$2,475.

c. On or about April 7, 2014, EADY deposited into the M&T Bank account of K.S., a Municipal Employee's Credit Union (MECU) check, # 399, from the account of S.T.

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in the amount of \$1,786. Continuing on or around this same date, EADY also deposited into the M&T Bank account of K.S., another MECU check, #400, from the account of S.T. in the amount of \$1,762. On or around April 8, 2014, EADY withdraws \$250 from the M&T ATM account of K.S. On or about November 27, 2013, EADY uses the debit card of K.S., to purchase MoneyGram money orders from a Walmart in the amount of \$2,502.10.

9. During the course of this scheme EADY has deposited checks issued for the accounts of more than two dozen different accounts. I infer from this that he likely has checkbooks from different accounts in his possession. I also know through my training and experience that the fraud transactions carried out by EADY typically result in hardcopy records, such as ATM receipts and receipts and documents relating to money orders.

10. In the course of his fraud, EADY has also used checks that investigators know were used by other, un-identified individuals who committed fraud via a similar scheme. In addition, at least one witness has told law enforcement that the witness was recruited to supply a debit card and PIN number by an accomplice of EADY's.

### CONCLUSION

11. Based on the above related information, I respectfully submit that there is probable cause to believe that TROY ANTHONY EADY has violated 18 U.S.C. §§ 1344 and 1028A.

Respectfully submitted,

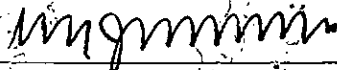


Theodore R. Lohman,  
Special Agent  
United States Secret Service



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Subscribed and sworn to before me on July 18<sup>th</sup>, 2014



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Timothy J. Sullivan  
UNITED STATES MAGISTRATE JUDGE

